# IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, LAW DIVISION

FILED 3/13/2019 5:32 PM DOROTHY BROWN CIRCUIT CLERK COOK COUNTY, IL

DONTA OWENS,

Plaintiff,

vs.

No. 2019L002778

TARIS REMON DOWDELL, and, MARTEN TRANSPORT SERVICES, LTD.,

Defendants.

Amount Claimed: in excess of \$50,000 PLUS COST FOR EACH PLAINTIFF

#### **COMPLAINT**

NOW COMES the Plaintiff, DONTA OWENS, by her attorneys, ELMAN LAW GROUP, LLC, and in complaining of the Defendants, TARIS REMON DOWDELL and MARTEN TRANSPORT SERVICES, LTD., states as follows:

- 1. That on the 14<sup>th</sup> day of October, 2017, the Plaintiff, DONTA OWENS, was operating a motor vehicle proceeding westbound in the 1700 block of East West Road in the City of Calumet City, County of Cook and State of Illinois.
- That on the said date, the Defendant, TARIS REMON DOWDELL, was the operator of a
  motor vehicle turning right while westbound onto the 1700 block of East West Road in
  the City of Calumet City, County of Cook and State of Illinois.
- 3. That on the said date, Defendant, TARIS REMOND DOWDELL, was a duly authorized agent of Defendant, MARTEN TRANSPORT SERVICES, LTD.
- 4. That at all times pertinent hereto, it was the duty of the Defendants to exercise ordinary care for the safety of the Plaintiff.
- 5. That notwithstanding said duty, the Defendants were guilty of one or more of the following negligent acts or omissions:
  - a. Failed to yield the right of way;
  - b. Failed to decrease the speed of said motor vehicles



EXHIBIT

- c. Proceeded at a speed which was greater than reasonable and proper with regard to traffic conditions, which endangered the safety of the Plaintiff;
- d. Failed to keep said motor vehicle under proper control;
- e. Failed to take proper evasive action to avoid a collision once it became imminent;
- f. Failed to warn the plaintiff by honking their horn;
- g. Operated said motor vehicle without keeping a proper and sufficient lookout; and,
- h. Failed to maintain their lane position.
- i. Attempted right turn when it wasn't safe to do so
- or omissions of the Defendants, the Defendants' motor vehicle collided with Plaintiff's vehicle, resulting in the Plaintiff sustaining injury to various portions of her body, requiring her to expend money for medical care and treatment; resulting in her experiencing pain, suffering and mental anguish both now and in the future; resulting in her becoming both temporarily and permanently disabled and disfigured; resulting in property damage having been caused to Plaintiff's vehicle; and resulting in out of pocket expenses.

WHEREFORE, Plaintiff, DONTA OWENS, prays for judgment against the Defendants, TARIS REMON DOWDELL and MARTEN TRANSPORT SERVICES, LTD., in a sum in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) plus costs for Plaintiff.

ELMAN LAW GROUP, LLC

By: ANTHONY R. ELMAN
Anthony R. Elman
Attorney for Plaintiff

ELMAN LAW GROUP, LLC #32429 212 W. WASHINGTON, SUITE 1208 CHICAGO, IL 60606

Phone: (312) 739-2159 Fax: (312) 739-2162

Email: elmanlawgroup.court@gmail.com

## AFFIDAVIT AND VERIFICATION PURSUANT TO SUP. CT. RULE 222 (B)

I, ANTHONY R. ELMAN, an attorney for the Plaintiff, states on oath that I am familiar with the facts relating to the above captioned matter. That the allegations contained in the Complaint are true and the nature and extent of Plaintiff's injuries are such that the claim has a value in excess of \$50,000.00, pursuant to S. Ct. Rule 222 (B).

ANTHONY R. ELMAN

ELMAN LAW GROUP, LLC #32429 212 W. WASHINGTON ST., SUITE 1208 CHICAGO, IL 60606

Phone: (312) 739-2159 Fax: (312) 739-2162

Email: elmanlawgroup.court@gmail.com

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Summons - Alias Summons		(06/28/18)	CCG 0001	COOK COUNTY, IL
2420 - Served By Publication	2421 - Served By Publication			CIRCUIT CLERK
2320 - Served By Mail	2321 - Served By Mail			3/13/2019 5:32 PM DOROTHY BROWN
2220 - Not Served	2221 - Not Served			FILED
2120 - Served	2121 - Served			

### IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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DONTA OWENS	2019L002778
(Name all parties)	
v.	
TARIS REMON DOWDELL and MARTEN TRANS	
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#### ☑ SUMMONS ☐ ALIAS SUMMONS

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance and pay the required fee within thirty (30) days after service of this Summons, not counting the day of service. To file your answer or appearance you need access to the internet. Please visit www.cookcountyclerkofcourt.org to initiate this process. Kiosks with internet access are available at all Clerk's Office locations. Please refer to the last page of this document for location information.

If you fail to do so, a judgment by default may be entered against you for the relief requested in the complaint.

To the Officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit https://efile.illinoiscourts.gov/service-providers.htm to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit http://www.illinoiscourts.gov/FAQ/gethelp.asp.

•	Witness:
	3/13/2019 5:32 PM DOROTHY BRO
Atty. No.: 32429	DOROTHY BROWN, Clerk of Court
Atty Name:  Atty. for:  Atty. for:  Address:  City:  Chicago  Zip:  City:  Chicago  State:  City:  Chicago  State:  Elman Law Group, LLC  Address:  Address:  City:  Chicago  State:  IL  Zip:  Primary Email:  Elman Law Group, LLC  Atty. for:  Address:  City:  Chicago  State:  IL  State:  City:  Condany Email:  Elman Law Group, LLC	Date of Service: (To be inserted by officer on copy left with Defendant or other person):  APR 10 2010
Tertiary Email:	· 後後後の大学を表現している。 (1995年) (19

#### CLERK OF THE CIRCUIT COURT OF COOK COUNTY OFFICE LOCATIONS

Richard J Daley Center 50 W Washington Chicago, IL 60602

District 2 - Skokie 5600 Old Orchard Rd Skokie, IL 60077

District 3 - Rolling Meadows 2121 Euclid Rolling Meadows, IL 60008

District 4 - Maywood 1500 Maybrook Ave

Maywood, IL 60153

District 5 - Bridgeview 10220 S 76th Ave Bridgeview, IL 60455

District 6 - Markham 16501 S Kedzie Pkwy Markham, IL 60428

Domestic Violence Court 555 W Harrison Chicago, IL 60607

Juvenile Center Building 2245 W Ogden Ave, Rm 13 Chicago, IL 60602

Criminal Court Building 2650 S California Ave, Rm 526 Chicago, IL 60608

## Daley Center Divisions/Departments

Civil Division Richard J Daley Center 50 W Washington, Rm 601 Chicago, IL 60602 Hours: 8:30 am - 4:30 pm

Chancery Division Richard J Daley Center 50 W Washington, Rm 802 Chicago, IL 60602

Hours: 8:30 am - 4:30 pm

Domestic Relations Division Richard J Daley Center 50 W Washington, Rm 802 Chicago, IL 60602 Hours: 8:30 am - 4:30 pm

Civil Appeals Richard J Daley Center 50 W Washington, Rm 801 Chicago, IL 60602

Hours: 8:30 am - 4:30 pm

Criminal Department Richard J Daley Center 50 W Washington, Rm 1006 Chicago, IL 60602 Hours: 8:30 am - 4:30 pm

County Division Richard J Daley Center 50 W Washington, Rm 1202 Chicago, IL 60602 Hours: 8:30 am - 4:30 pm

Probate Division
Richard J Daley Center
50 W Washington, Rm 1202
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm

Law Division
 Richard J Daley Center
 50 W Washington, Rm 801
 Chicago, IL 60602
 Hours: 8:30 am - 4:30 pm

Traffic Division
Richard J Daley Center
50 W Washington, Lower Level
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm

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ID: LD2019L002778 20190318000003

AT: ELMAN ANTHONY R

TO: ELMANLAUGROUP.COURT@GMAIL.COM

\* \* \* \* \* N O T I C E \* \* \* \* \*

CASE 19-L-002778

OWENS DONTA V. DOWDELL TARIS
THERE WILL BE A CASE MANAGEMENT CALL OF YOUR CASE ON THURSDAY
THE 9TH DAY OF MAY IN ROOM 2210 AT 9:00 A.M. AT THE
DALEY CENTER COURT HOUSE, 50 WEST WASHINGTON STREET, CHICAGO, IL

